

ROSSI, CROWLEY, SANCIMINO & KILGANNON, LLP
ATTORNEYS AT LAW

THOMAS J. ROSSI
THERESA E. CROWLEY
SALLY SANCIMINO
TIMOTHY KILGANNON

42-24 235TH STREET
DOUGLSTON, NEW YORK 11363

TELEPHONE: (718) 428-9180
FACSIMILE: (718) 279-8393

1551 KELLUM PLACE
MINEOLA, NEW YORK 11501

TELEPHONE (516) 746-5530
FACSIMILE (516) 746-5538

LISA MEVORACH
JUSTIN HOITSMA

OF COUNSEL
FRANK X. KILGANNON

April 12, 2019

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #
DATE FILED: 4/17/2019

-Via ECF-

Honorable Edgardo Ramos,
United States District Judge
Thurgood Marshall United States Courthouse
40 Foley Square
New York, New York 10007

MEMO ENDORSED

Re: United States v Mario Alvarenga, et al S4 15 Cr. 627 (ER)

Dear Judge Ramos:


We represent Petermark II LLC and Advill Capital LLC in connection with the forfeiture proceedings on a parcel of real property located at 644 Chauncey Street in Brooklyn.

I am writing concerning a motion filed by the government on March 4, 2019 seeking to dismiss certain portions of an amended petition filed by several petitioners including our clients. Unfortunately, we did not realize until yesterday that the motion was addressed to our clients as well as the three other parties. I checked the ECF docket sheet and did not see that a briefing schedule was set, but we were informed yesterday by AUSA Sheb Swett that the deadline for opposition was April 4th. I have found no decision on the motion on the ECF docket sheet and so assume it is still pending.

Assuming that the deadline for opposition has passed, I respectfully request that we be given until April 23rd to submit opposition to that motion. I apologize to the Court and to other counsel for this inadvertence and ask the indulgence of the Court and fellow counsel.

Thank you.

The application is X granted
_____ denied


Edgardo Ramos, U.S.D.J.
Dated: 4/17/2019
New York, New York

Respectfully submitted,


Thomas J. Rossi